

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**[PROPOSED] ORDER GRANTING  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL ITS OFFERS OF PROOF  
REGARDING REASONABLE ROYALTY  
DAMAGES AND DISCLOSURE OF THE  
ASSERTED TRADE SECRETS**

1 Plaintiff Waymo LLC (“Waymo”) has filed an Administrative Motion to File Under Seal  
 2 its Offers of Proof Regarding Reasonable Royalty Damages and Disclosure of the Asserted Trade  
 3 Secrets (the “Administrative Motion”).

4 Having considered the Administrative Motion, and good cause to seal having been shown,  
 5 the Court **GRANTS** Waymo’s Administrative Motion and **ORDERS** sealed the documents listed  
 6 below:

Document	Portions to Be Filed Under Seal	Designating Party
Ex. 1 to November 12 jury instruction submission (“Disclosure Offer of Proof”)	Entire document	Waymo and Defendants
Ex. 2 to November 12 jury instruction submission (“Reasonable Royalty Offer of Proof”)	Entire document	Waymo and Defendants

12 **IT IS SO ORDERED.**

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 15 Dated: \_\_\_\_\_, 2017

16 \_\_\_\_\_  
 17 HON. WILLIAM ALSUP  
 18 United States District Court Judge  
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